



# Desert Control Third-Party Code of Conduct

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# Desert Control Third-Party Code of Conducy

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## INTRODUCTION

Desert Control AS and its subsidiaries (collectively, “Desert Control”) are committed to conducting their business under the highest ethical standards and in full compliance with all applicable laws and regulations in the jurisdictions in which Desert Control operates. As part of that commitment, Desert Control ask of all companies and individuals with whom it does business to do the same. Desert Control emphasizes its obligation to comply with these standards and rely on its Third Parties (as defined below) to adhere to the same core values and principles as Desert Control.

## SCOPE

This Third-Party Code of Conduct expresses the expectations to which Desert Control is committed, and to which we strive for as a standard for all Third Parties engaged by Desert Control anywhere in the world.

The Third-Party Code of Conduct is for suppliers, vendors, distributors, re-sellers, subcontractors, agents, consultants and other third parties engaged by Desert Control (collectively, “Third Parties”). Desert Control ask for its Third Parties to impose similar requirements and standards as outlined in this Third-Party Code of Conduct on any of their suppliers, vendors, distributors, re-sellers, subcontractors, agents, consultants and other third parties whom they engage to assist them in providing services or products to Desert Control.

A copy of this Third-Party Code of Conduct shall be provided or made available to all Third Parties at the time of engagement or within a reasonable time thereafter.

## STANDARDS AND EXPECTATIONS

### Legal and Regulatory Compliance

Desert Control expects its Third Parties to conduct business in full compliance with all applicable laws and regulations. In addition to the obligations that Desert Control’s Third Parties assume in contractual agreements with Desert Control, Desert Control expects its Third Parties to meet the obligations described below. To the extent more specific terms and conditions are specified in a contractual agreement, the more specific terms and conditions govern and supplement (but do not supersede) those herein. Desert Control reserves the right to seek information and documentation from its Third Parties to assess compliance with this Third-Party Code of Conduct, including the right to audit its Third Parties. Desert Control will carry any costs related to such requested audits.

### DESERT CONTROL’S THIRD PARTIES SHOULD COMPLY WITH:

#### Economic Sanctions, Anti-Boycott, Export Controls

- Comply with all applicable local and international economic sanction laws and regulations (including but not limited to the local country of operation, Norway, EU, UK, and USA laws and regulations).
- Never conduct business on Desert Control’s behalf with individuals, entities, organizations or countries that are subject to economic sanctions laws and similar regulations.
- Never participate in any boycott or restrictive trade practice, unless sanctioned by the applicable authorities.
- Comply with all applicable local and international export control, re-export and import restrictions.

#### Antitrust and Competition Law

- Comply with all applicable local and international antitrust and competition laws and regulations.
- Compete lawfully in all markets in which the Third Party operates.
- Obtain information about Desert Control competitors only from lawful and appropriate sources.
- Never discuss with any competitor prices, bids, customer sales, bid rigging, market allocation, or other competitively sensitive and/or confidential information.

#### Anti-Money Laundering

- Comply with all applicable local and international laws and regulations pertaining to the detection, prevention, and reporting of potential money laundering and terrorist financing activities.

### Anti-Corruption

- Comply with all applicable local and international anti-corruption laws, including the United States Foreign Corruption Practices Act and all other applicable laws that prohibit corruption, extortion, kickbacks, or bribery, and including the U.K. Bribery Act 2010.
- Never pay bribes or provide other improper benefits to any person (whether or not a government official) to obtain and retain business or secure a business advantage.
- Never promise, offer, or authorize payment of money or anything else of value to a government official, including employees of government-owned or government-controlled entities (including non-governmental agencies and officials, such as a United Nations agency) in order to obtain or retain business, or induce the government official to do or not do something in violation of the official's lawful duties, or secure a business advantage.
- Maintain books and records that accurately reflect the true nature of transactions.

### GDPR, Data Privacy and Security

- Comply with all local and international privacy and data protection laws and regulations, including laws and regulations regarding the cross-border transfer of personal information.
- Maintain appropriate procedures, safeguards and controls to secure and protect the confidentiality and integrity of all personal information received from, or processed on behalf of, Desert Control.

### Insider Trading

- Never transact in Desert Control securities or another company's securities (including companies unaffiliated with Desert Control) while in possession of material, non-public information relating to Desert Control or such other company where that information was obtained in the course of performing services to Desert Control.
- Never pass on ("tip") confidential or material non-public information to others or recommend to anyone the purchase or sale of the relevant securities if you are in receipt of material non-public information where that information was obtained in the course of performing services to Desert Control.

### Commitment to Human Rights

- Commit to act ethically and with integrity in all business relationships.
- Support international human rights as they are specified in the United Nations' Universal Declaration of Human Rights including related conventions. Human dignity, protection of privacy, and the rights of those one is in contact with through work are to be respected. No person shall in any way cause or contribute to violation of or other evasion of human rights.
- The company is opposed to forced labor, including work performed as payment of debt, and have a zero-tolerance policy for child labor.

### Anti-Slavery and Anti-Trafficking

- Always protect and advance human dignity and human rights in business practices. Commit to a zero-tolerance approach to any form of modern slavery. Commit to act in an ethical manner, with integrity and transparency in all business dealings.
- Commit to ensure effective systems and controls to safeguards against any form of modern slavery taking place within the business. An Anti-Trafficking in Persons Policy is adopted by Desert Control in order to comply with International Government Policies on Human Trafficking, which includes details of how staff can report matters of concern and a prohibition on retaliation against those who report human trafficking.
- Commit to a hiring policy which includes 'right to work' checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015.

### Child Labor – Minimum Age Convention

- Comply with the [International Labour Organization \(ILO\)](#) and the [U.N Convention on the Rights of the Child](#) guide our policy on child labor. When it comes to legal aspects, always:
- Follow the stricter law if more than one laws apply (e.g. state and federal, local and international).
- Require suppliers, partners and vendors to follow the stricter applicable laws and recognize children’s rights. They must also require their own suppliers, subcontractors and stakeholders to do the same.
- Desert Control is committed not to do business with any organization that employs children younger than 15. This is as a condition for every contract we sign, and we reserve the right to break the contract without penalty if our stakeholder violates this condition and refuses to agree on or follow through with a cure plan.

### Non-Discrimination and Fair Pay

- Desert Control have a strict non-discrimination policy. We believe everyone should be treated equally regardless of race, sex, gender identification, sexual orientation, national origin, native language, religion, age, disability, marital status, citizenship, genetic information, pregnancy, or any other characteristic protected by law. We have a zero-tolerance policy for sexual harassment or discrimination, racial harassment or discrimination, or any other form of harassment and discrimination. We are committed to fair pay, transparent compensation principles and a diverse and inclusive workplace. Third Parties should follow similar policy guidelines.

### Environmental and Sustainability Compliance

- Desert Control is committed to conducting its business in compliance with all applicable environmental laws and regulations in a manner that has the highest regard for the health, safety, environment, and well-being of employees, nature, natural resources, and the general public.

## CONFIDENTIAL INFORMATION

Desert Control expects its Third Parties to keep confidential all proprietary and sensitive information received by it from Desert Control, or disclosed to it by Desert Control, and to take precautions to safeguard such information that are at least as stringent as those that it uses to protect its own information of a similar nature. No disclosure of such Confidential Information is permitted except as required by law or with the express written consent of Desert Control, or in accordance with written agreements between the Third Party and Desert Control.

## CONFLICTS OF INTEREST

Desert Control expects its Third Parties to avoid actual or potential conflicts between their personal interests (and those of their employees) and the interests of Desert Control. Desert Control’s Third Parties shall not knowingly deal directly with a Desert Control employee whose family member or relative, including spouse or domestic partner, has a financial interest in the Third Party.

## INTELLECTUAL PROPERTY

Desert Control expects its Third Parties to protect the intellectual property (IP) of Desert Control and its business partners and suppliers (including the other Third Parties), and to consult with Desert Control or the applicable IP owner in advance of using or disclosing Desert Control’s or another party’s intellectual property to other third parties without the express written consent of Desert Control or the applicable owner. Desert Control or the applicable owner shall remain the owner of such intellectual property and no rights or interests are transferred to Third Parties.

## RECORDS RETENTION, DATA MANAGEMENT, AND GDPR

Desert Control expects its Third Parties that create records that contain information relating to Desert Control operations and administration and/or are subject to legal and regulatory record retention requirements (“[Desert Control Records](#)”) to retain such Desert Control Records in accordance with all applicable legal and regulatory record retention requirements. All such records should be in compliance with GDPR.

Further Desert Control refers to its GDPR and Privacy Policy and asks that Third Parties adhere to this policy in all dealings with Desert Control, and to ensure any sub-contractors or other parties the Third Party involves does the same.

## **AUTHORITY TO MAKE COMMITMENTS ON BEHALF OF DESERT CONTROL**

No Third Party can make any commitments, enter into any agreement, or form any kind of obligations on behalf of Desert Control. Only personnel of Desert Control that explicitly has the authority to enter into obligations and sign on behalf of the company, has the authority to sign contracts, make purchase commitments, and form any binding commitment with any Third Party.

## **MATERIAL BREACH**

Desert Control will only do business with Third Parties that comply with all applicable local and international laws (including but not limited to the local country of operation, Norway, EU, UK, and USA laws and regulations).

Desert Control reserve the right to break the contract and terminate pending purchase orders without penalty in the event of violation of this condition and with Third Parties who refuses to agree on or follow through with an acceptable plan to cure any material breach that violate this Third-Party Code of Conduct. This right is in addition to (and is not superseded by) any rights in a purchase order or contract.

## **REPORTING VIOLATIONS**

Desert Control expects its Third Parties to report any violations of this Third-Party Code of Conduct to Desert Control's CEO or Board of Directors to whom contact information is found on the Company webpage.

## **INQUIRIES AND UPDATES**

All inquiries and questions in relation to this Third-Party Code of Conduct or its applicability to particular persons or situations should be addressed to Desert Control's CEO or Chairman of the Board of Directors.

Desert Control's Board of Directors may update this Third-Party Code of Conduct from time to time.

The Board of Directors  
Desert Control AS  
Sandnes, Norway, 26. March 2021